

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

IN RE BARD IVC FILTERS  
PRODUCTS LIABILITY LITIGATION

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MDL NO. MD-15-02641-PHX-DGC  
CIVIL ACTION NO. 2:18-cv-04792

William Ford v. C.R. Bard, Inc. et al.

MOTION

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**MOTION FOR LEAVE TO FILE AMENDED COMPLAINT**

Plaintiff, William Ford, by and through his attorneys respectfully seeks leave of Court to file an Amended Short Form Complaint in this matter for the reasons set forth below:

1. The lawsuit was directly filed in this MDL on December 19, 2018. Plaintiff seeks to amend the pleadings to no longer include C. R. Bard, Inc. as named-defendant, and to claim diversity of citizenship as the basis of jurisdiction.

2. Under Federal Rule of Civil Procedure 15(a), leave of court to amend a petition should be freely given when justice so requires. No party will be prejudiced by this change. It is hereby requested that this Motion for Leave to File Amended Short Form Complaint be granted.

Dated: January 10, 2020

**MCSWEENEY/LANGEVIN**

/s/ David M. Langevin  
2116 2<sup>nd</sup> Ave S.  
Minneapolis, MN 55404  
Telephone: 612-746-4646  
Email: dave@westrikeback.com